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*David S. [Signature]*  
Attorney for Applicant

PATENT  
Docket No. ST9-99-146

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Jan Burchhardt et al. )  
Serial No.: 09/587,581 )  
Filed: June 5, 2000 ) Group Art  
For: REPRESENTING IMS MESSGES AS XML ) Unit: 2176  
DOCUMENTS )  
Examiner: Nathan Hillary

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FEB 25 2004

Technology Center 2100

TELEPHONE INTERVIEW AGENDA

Honorable Commissioner of  
Patents and Trademarks  
Washington, D.C. 20231

Dear Sir:

In preparation for the telephone interview on February 26<sup>th</sup> at 2pm EST, Applicants are submitting this proposed interview agenda. In addition, to facilitate the discussion Applicants are submitting pages 4 and 5 from the specification for discussion.

In the outstanding Office Action, the Examiner rejected claims 1-30 under 35 U.S.C. §103(a) as obvious in view of U.S. Patent No. 5,737,597 to Blackman et al. (hereinafter "Blackman"), a publication from W3C on WIDL (hereinafter "WIDL"), U.S. Patent No. 6,038,393 to Lyengar et al. (hereinafter "Lyengar"), a publication on "XMI Opens Application Interchange" by Brodsky (hereinafter "Brodsky"), and U.S. Patent No. 6,182,029 to Friedman et al. (hereinafter "Friedman").

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## REMARKS

Applicants would like to discuss where objective teachings that suggest the claimed subject matter of claims 1, 11, and 21 are specifically taught in the prior art. *See In re Fine*, 837 F.2d 1071, 1074, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988).

Specifically, Applicants would like to discuss where the prior art teaches “generating an **XML document template** from an **IMS message definition**; and merging an **IMS message** with the generated template to produce a corresponding XML document.” (claim 1, emphasis added). In particular, Applicants find only a cursory reference to IMS in Blackman and no references in any of the prior art to an “IMS message definition” or “an IMS message” which are specifically recited in claim 1. Applicants submit that such clear and specific language limits the scope of the present invention to steps involving IMS message definitions. Applicants submit that giving this term its “plain meaning” clearly defines the invention and places the invention outside the scope of the prior art. *See In re Zletz*, 893 F.2d 319, 321, 13 USPQ2d 1320, 1322 (Fed. Cir. 1989), MPEP §2111.01.

Applicants would like to discuss how the prior art which does not discuss messaging in IMS can rise to the level of a combination of prior art references that teaches or suggests all the claim limitations as required for a rejection under 35 USC §103(a). *See* MPEP § 2142. In particular, the prior art fails to teach anything regarding an “IMS message definition” or “an IMS message.”

Blackman discusses building object oriented software to interconnect object oriented applications with non-object oriented datastores such as IMS. Blackman teaches software for accessing IMS data (a data level operation), not interacting (exchanging messages, an application level operation) with an IMS application. Applicants would like to discuss how an IMS message definition deals with messaging between an IMS system and an external application, not accessing data.

Applicants would also like to discuss failure of the prior art to generate a template in any format based on I/O message formats, IMS message definitions. Applicants would like to discuss the following definition of template. “In spreadsheet and database applications, a template is a blank form that shows which fields exist, their locations, and their length. In

spreadsheet applications, for example, a template is a spreadsheet in which **all** the **cells** have been **defined but no data** has yet been **entered**.” (Emphasis Added)

WWW.WEBOPEDIA.COM. Applicants would like to discuss where such a template is disclosed in the prior art.

Finally, Applicants would like to discuss where in the prior art references one of ordinary skill in the art would be motivated to make the combination suggested by the Examiner. Applicants would like to discuss how one with a computer science or electrical engineering degree, one of ordinary skill in the art, would interpret the cited prior art. Furthermore, Applicants would like to understand why one of ordinary skill in the art would make the combination suggested by the Examiner when the combination lacks such important elements, the IMS messages and IMS message definitions.

If any issues remain that can be resolved by a telephone conversation, the Examiner is respectfully requested to contact the undersigned.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "David J. McKenzie", is written over a horizontal line.

David J. McKenzie

Reg. No. 46,919

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For example, as illustrated in Figure 3, the IMSCTL 26 controls one or more connected terminals 28, sending and receiving messages to and from the terminals 28. Moreover, the IMSCTL 26 logs all transactions in order to provide the capability of undoing non-committed transactions in the event of a system failure.

In addition, every time the IMSCTL 26 receives an input message 30 from a terminal 28, it schedules an application 18 to process the message 30. The IMSCTL 26 identifies the desired application 18 and puts the message 30 in the application's message queue 32. The application 18 processes the message 30 and responds to the originating terminal 28 by placing an output message 30 in the terminal's message queue 34.

As illustrated in Figure 4, an input message 30 typically includes the following fields:

LL	Length of the message segment.
ZZ	Reserved for IMS.
TRANCODE	Transaction code that identifies the application 18.
Text	Message text sent from the terminal 28 to the application 18.

The structure of an output message 30 is similar, except that the TRANCODE field is missing.

In general, messages 30 belong to one particular IMS application 18. When the application 18 is implemented, the format of the message 30, including the types

1 and lengths of its fields, must be defined. The format of a message 30 is referred to  
2 herein as a message definition 38. Message definitions 38 may be implemented  
3 using various programming languages, such as COBOL, assembler, PL/I and  
4 Pascal. For example, the message definition 38 illustrated in Figure 4 is  
5 implemented in COBOL.

6       Unfortunately, IMS messages 30 are in a proprietary format, whereas the  
7 Internet is based on open standards, such as the HyperText Markup Language  
8 (HTML), a variant of the eXtensible Markup Language (XML). As a result,  
9 interfacing IMS with remote systems via the Internet can be difficult. Accordingly,  
10 what is needed is a system and method for representing IMS messages 30 in an  
11 open, interchangeable format, such as XML.